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July 14, 2003

Marianne Lamont Horinko
Acting Administrator
US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-to-Know Program

2003 JUL 21 PM 3:30

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OPPT CBIC

Re: Comments received on the Petroleum Additives Panel, HERTG HPV Challenge Test Plan for dithiophosphate alkyl esters Category

Dear Administrator Lamont Horinko:

On November 11, 2002, the American Chemistry Council Petroleum Additives Panel, Health, Environmental and Regulatory Task Group (HERTG) submitted a test plan and supporting robust summaries for the following nine chemicals in the dithiophosphate alkyl esters category:

- Phosphorodithioic acid, mixed O,O-bis (1,3-dimethylbutyl and iso-propyl) esters – (CAS # 84605-28-7), referred to as “mixed 1,3-dimethylbutyl and iso-propyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(iso-butyl and pentyl) esters – (CAS # 68516-01-8), referred to as “mixed isobutyl and pentyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(sec-butyl and 1,3 dimethylbutyl) esters – (CAS # 68784-30-5), referred to as “mixed sec-butyl and 1,3-dimethylbutyl derivative”
- Phosphorodithioic acid mixed O,O-bis(sec-butyl and isooctyl) mixed esters – (CAS # 113706-14-2), referred to as “mixed sec-butyl and isooctyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(2-ethylhexyl and iso-butyl) esters – (CAS # 68784-32-7), referred to as “mixed 2-ethylhexyl and isobutyl derivative”
- 2-Pentanol, 4-methyl-hydrogen phosphorodithioate – (CAS # 6028-47-3), referred to as “1,3-dimethylbutyl derivative”
- Phosphorodithioic acid, O,O-bis(2-ethylhexyl) esters – (CAS# 5810-88-8), referred to as “2-ethylhexyl derivative”
- Phosphorodithioic acid, O,O-dioctyl ester, branched – (CAS# 68649-43-4), referred to as “branched isooctyl derivative”
- Phosphorodithioic acid, O,O-diisooctyl ester – (CAS# 26999-29-1), referred to as “isooctyl derivative”



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The HERTG has received comments from EPA on the test plan and robust summaries for dithiophosphate alkyl esters category. In addition to the comments received from the EPA, the HERTG is also aware of comments that were submitted by the People for the Ethical Treatment of Animals (PETA) and Environmental Defense (ED) to the EPA.

The HERTG appreciates the efforts of EPA, PETA and ED in preparing comments and is reviewing the recommendations presented in the comments. The HERTG will carefully consider those recommendations, and how they may enhance the existing test plan as the work gets underway for the dithiophosphate alkyl esters category.

If you have any questions or comments, please contact Sarah Loftus McLallen at (703) 741-5607 or via email at Sarah_McLallen@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR